ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
ER REGULATORY CONTACT RECORD

Date/Time:	November 11, 2004/ 0600 Hrs.
Site Contact(s):	Gary J. Carnival
Phone:	303-966-2258/303-994-0734
Regulatory Contact:	David Kruchek
Phone:	303-692-3328
Agency:	CDPH&E
Purpose of Contact:	Establish an agreement on backfilling NPWL excavations

Discussion There are approx. 10,500 linear feet of new process waste lines (NPWL) that were not able to be RCRA cleaned and are scheduled for removal. In addition to these process waste lines, there are eight valve vaults in a similar condition which are scheduled for remediation or removal. A schedule will be provided as soon as one is available. In addition, DOE and CDPH&E will be notified via e-mail at the time NPWL activities change locations as indicated in the schedule. Removal of these waste lines and valve vaults will support the overall closure of the NPWL project. The process waste lines consist of a thick wall 6" or 8" diameter polyethylene pipe (thickness ranging from ½" to ¾") as an outer, secondary containment pipe encapsulating a smaller, 3" to 4" diameter fiberglass reinforced pipe which served as the primary transfer pipe. Initial excavations at the intersection of the NPWLs and the rail spur between VV 11 and VV 12, indicate both the inner and outer pipe are embedded in sand and are in very good condition with no evidence of any breach of containment, leaks, or stained soil. Historical characterization/confirmation sampling along the NPWL network is insufficient in number and depth. As a result, additional characterization/confirmation sampling will be performed beneath the NPWL pipes as specified in the ER RSOP and the ER RSOP Notification Letter, i.e. at valve vaults, every 100' of pipe, and where there is evidence of breaches of containment, leaks, and/or stained soil. The analytes will include rad, metals, and in the event the excavation falls within a reported nitrate/nitrite plume, nitrates and nitrites will be added to the analysis requested. The confirmation/characterization samples taken for NPWLs where plutonium and americium may have been introduced will have a gamma spectroscopy field screen performed before submitting the sample for offsite analysis. The confirmation/characterization samples taken for NPWLs where the only rad that may have been introduced is uranium will have a gamma spectroscopy measurement performed by URS prior to being submitted for offsite analysis. The results of these two measurements will provide the basis for backfilling the excavation "at risk" pending the final results of the offsite analysis. For the plutonium/americium areas, the americium value derived from the field gamma spec measurement will be multiplied by a factor of 5.7 to arrive at the plutonium value. Excavations will be backfilled "at risk" if the calculated plutonium field screen gamma spec values and the uranium values determined by URS gamma spec are less than established action levels. These initial values will be reported to DOE and CDPH&E for each excavation area being backfilled.

Contact Record Prepared By: Gary J. Carnival

Required Distribution:

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